

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE  
HONORABLE BOARD OF PATENT APPEALS AND INTERFERENCES**

Application of: Ercan E. Kuruoglu et al.	)	Examiner: Gautam Sain
	)	
Appl. No.: 09/738,992	)	Art Unit: 2176
	)	
Filed: 12/19/2000	)	Docket No. A0841-US-NP

Title: **METHOD AND APPARATUS FOR COLLABORATIVE ANNOTATION OF A  
DOCUMENT**

Board of Patent Appeals and Interferences  
United States Patent and Trademark Office  
P.O. Box 1450  
Alexandria, VA 22313-1450

**REPLY BRIEF IN RESPONSE TO EXAMINER'S ANSWER**

Sir:

Appellant respectfully submits this Reply Brief in the appeal of the present case to the Board of Appeals and Patent Interferences in response to the Examiner's Answer mailed August 24, 2006.

## I. Response To Examiner's Argument

### 1. Cass Does Not Disclose Or Suggest Communicating Data Representing Identified Annotation Images To Each Of A Plurality Of Workstations As Claimed By Appellant

On page 21, lines 3-4, the Examiner's Answer alleges that "Cass further discloses the claimed limitation of *communicate data representing the identified annotation images to each workstation*". However, the claimed limitation recited in independent claims 1, 11, and 12 recites that data representing identified annotation images are communicated to each of a plurality of workstations to permit an annotation entered at a first workstation to the hardcopy document and an annotation entered at a second workstation to the hardcopy document to be distributed to the plurality of workstation. Instead, the examples of Cass cited in the Examiner's Answer on page 21, lines 4-18, are directed to a method for using arbitrary documents as computer readable forms as summarized by Appellant on page 12, lines 4-11, of Appellant's Appeal Brief filed June 6, 2006. Unlike Appellant's claimed limitation that allows a plurality of users to collaboratively share annotations made to a hardcopy document, Cass identifies active elements associated with a reference document, where the active element is associated with at least one action.

### 2. Simonoff Does Not Disclose Or Suggest Selectively Displaying Annotations In Accordance With Display Criteria Of Each Of A Plurality Of Workstations As Claimed By Appellant

On page 5, lines 3-5, the Examiner's Answer alleges that "Simonoff discloses the claimed limitation of *selectively displaying annotations in accordance with the display criteria for each workstation*". The Examiner's Answer also set forth on page 5, lines 17-18, that Carleton in view of Tran and Simonoff do not teach the annotation of hardcopy documents. In contrast, Appellant's invention recited in independent claims 1, 11, and 12 concerns the display of handwritten annotations in digital images captured at each of a plurality of workstations, where the annotations are selectively displayed in accordance with the display criteria of each workstation. That is, the disclosure in Simonoff at column 4, lines 34-67, (referred to on page 5, lines 5-13, of the Examiner's Answer) concerns methods for processing "inputs containing user actions and data for

interpretation as to what the user action is with respect to the data and produces user action outputs" (see Simonoff column 4, lines 36-38) and shared accessibility of a data object (see Simonoff column 4, lines 55-59), not the selective display of handwritten annotations in digital images captured at each of a plurality of workstations as claimed by Appellant.

## **II. Conclusion**

Based on the arguments presented in the Appeal Brief filed June 6, 2006 and this Reply Brief, applicant asserts that claims 1-22 are in condition for allowance. Applicant therefore urges the Board of Patent Appeals and Interferences to reverse the Examiner's final rejection of claims 1-22.

Respectfully submitted,



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